

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO DEC - 2 2009

**SAMANTHA PERINO,
JEANNIE HETHERINGTON, and
JILL DUSENBERRY,**

**MATTHEW J. DYKMAN
CLERK**

Plaintiffs,

vs.

CIV No. 07-144 WDS/DJS

GLENN SLAUGHTER,

Defendant.

SPECIAL VERDICT FORM

I. PLAINTIFFS' ILLEGAL SEARCH CLAIM

1. Do you find by a preponderance of the evidence that Plaintiff Reeves-Frame was strip searched in the dressing room.

Yes _____

No

If your answer is Yes proceed to question number 2. If the answer is No you have returned a verdict for the Defendant as to this Plaintiff's claim and you should proceed to question number 3.

2. Do you find by a preponderance of the evidence that Defendant Slaughter set into motion a series of events that he knew or reasonably should have known would cause others to violate Plaintiff's constitutional rights, or if he personally directed other officers to commit the violation or if he had actual knowledge of the violation and acquiesced in its continuance.

Yes _____

No _____

If you have answered "Yes" to questions 1 and 2 you have found liability in favor of this Plaintiff. You will ultimately proceed to question number 9 to consider

damages. Proceed to question 3.

3. Do you find by a preponderance of the evidence that Plaintiff Hetherington was strip searched in the dressing room.

Yes _____ No ✓

If your answer if Yes proceed to question number 4. If the answer is No you have returned a verdict for the Defendant as to this Plaintiff's claim and you should proceed to question number 5.

4. Do you find by a preponderance of the evidence that Defendant Slaughter set into motion a series of events that he knew or reasonably should have known would cause others to violate Plaintiff's constitutional rights, or if he personally directed other officers to commit the violation or if he had actual knowledge of the violation and acquiesced in its continuance

Yes _____ No _____

If you have answered "Yes" to questions 3 and 4 you have found liability in favor of this Plaintiff. You will ultimately proceed to question number 9 to consider damages. Proceed to question 5.

5. Do you find by a preponderance of the evidence that Plaintiff Dusenberry was strip searched in the dressing room.

Yes ✓ No _____

If your answer if Yes proceed to question number 6. If the answer is No you have returned a verdict for the Defendant as to this Plaintiff's claim and you should proceed to question number 7.

6. Do you find by a preponderance of the evidence that Defendant Slaughter set into motion a series of events that he knew or reasonably should have known would cause others to violate Plaintiff's constitutional rights, or if he personally directed other officers to commit the violation or if he had actual knowledge of the violation and acquiesced in its continuance.

Yes No _____

If you have answered "Yes" to questions 5 and 6 you have found liability in favor of this Plaintiff. You will ultimately proceed to question number 9 to consider damages. Proceed to question 7.

II. PLAINTIFFS' STATE LAW CLAIMS

7. Do you find by a preponderance of the evidence that Defendant Slaughter falsely imprisoned the following Plaintiffs?

Samantha Reeves-Frame: Yes _____

No

Jeannie Hetherington: Yes _____

No Jill Dusenberry: Yes

No _____

If you have answered "Yes" with respect to any of the above Plaintiff's you have found liability in favor of their claim. You will ultimately proceed to question No. 9 to consider damages. Proceed to question 8.

8. Do you find by a preponderance of the evidence that Defendant Slaughter assaulted the following Plaintiffs?

Samantha Reeves-Frame: Yes _____

No

Jeannie Hetherington: Yes _____

No

Jill Dusenberry: Yes _____

No

If you have answered "Yes" with respect to any of the above Plaintiff's you have found liability in favor of their claim. You will proceed to question No. 9 to consider damages.

IV. PLAINTIFFS' CLAIM FOR DAMAGES

9. In accordance with the damage instructions given by the Court, we award the following compensatory damages:

Samantha Reeves-Frame: \$ 0

Jeannie Hetherington: \$ 0

Jill Dusenberry: \$ 2,000

Please proceed to Question No. 7.

10. In accordance with the damage instructions given by the Court, we award the following punitive damages for the violation of Plaintiffs' Fourth Amendment constitutional rights only:

Samantha Reeves-Frame: \$ 0

Jeannie Hetherington: \$ 0

Jill Dusenberry: \$ 3,000

You have now completed this verdict. Your foreperson must sign this verdict, and you will all return to open court.

DATED December 2, 2009.

FOREPERSON